

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

ARGO FINE IMPORTS, LLC,

Case No. 1:22-cv-02990

Plaintiffs

Hon. Richard D. Bennett

v.

**M/V TAC IMOLA, IMO No. 9932103 her
engines, boilers, tackle, etc., *in rem*,
HANWIN SHIPPING, LTD., RATU
SHIPPING CO. SA, NISSHIN SHIPPING
CO LTD, FLEET MANAGEMENT LTD-
HKG, TRANSATLANTICA
COMMODITIES, PTE LTD., *in personam*,**

In Admiralty

Defendants

RESTRICTED APPEARANCE AND VERIFIED STATEMENT OF INTEREST

NOW INTO COURT, through undersigned counsel, comes Ratu Shipping, Co. SA (“Claimant”) and hereby enters its restricted appearance pursuant to Rule E(8) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and its Statement of Interest pursuant to Rule C(6)(a)(i) of the Supplemental Rules, as Owner of the vessel M/V TAC IMOLA, IMO No. 9932103 her engines, boilers tackle, apparel, appurtenances and all accessories hereunto appertaining and belonging to her, etc., *in rem* (collectively “”M/V TAC IMOLA”), and makes claim to the M/V TAC IMOLA, as the same are proceeded against by Plaintiff in the captioned matter. Claimant was at the time of the filing of the Complaint herein, and has at all relevant times remained, the Owner of the M/V TAC IMOLA; and thus specially appears for the sole purpose of requesting that it be allowed to defend on behalf of the M/V TAC IMOLA *in rem*, and seek restitution of same.

Claimant appears specially in this action for the sole purpose of defending against the claims of Plaintiffs, with respect to which claim there has issued process *in rem* against the M/V TAC IMOLA, and this appearance is expressly restricted to the defense of such claims and does not constitute an appearance for the purpose of any other claim or claims, including, but not limited to, *in personam* claims and any claim with respect to which *in rem* process is not available or that has not been served. Claimant specifically reserves all rights and defenses with respect to this Honorable Court's exercise of jurisdiction over its person, these proceedings, and the M/V TAC IMOLA *in rem*, and with respect to the requirements of the Federal Rules of Civil Procedure; and further reserves any and all rights, including without limitation to assert responsive pleadings, relevant defenses or counterclaims, and to seek stay/dismissal of these proceedings in favor of arbitration pursuant to the Federal Arbitration Act (9 U.S.C. §§1, *et seq.*), New York Convention (9 U.S.C. §§201 *et seq.*), and any other applicable law, as may be supported by the allegations of, and facts underlying, this matter.

Respectfully submitted,

/s/ Constantine Themelis

Jack R. Daley (jdaley@bakerdonelson.com)
Constantine Themelis (gthemelis@bakerdonelson.com)
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
100 Light Street
Baltimore, MD 21202
Tel: (410) 862-1138
Fax: (410) 547-0699

Of Counsel:

Don P. Murnane, Jr. (murnane@freehill.com)
J. Tanner Honea (honea@freehill.com)
Michael J. Dehart (dehart@freehill.com)
Freehill Hogan & Maher, LLP
80 Pine Street, 25th Floor
New York, NY 10005